

Message

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**From:** Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]  
**Sent:** 1/14/2020 6:54:06 PM  
**To:** Praskins, Wayne [Praskins.Wayne@epa.gov]  
**Subject:** RE: Consultation on the Navy's use of the RESRAD BUILD calculator to evaluate Hunters Point remediation goals

Please share any follow-up you may have sent to Mary (FFRRO) since November, if it's relevant.

Yolanda

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**From:** Praskins, Wayne <Praskins.Wayne@epa.gov>  
**Sent:** Tuesday, November 12, 2019 12:13 PM  
**To:** Cooke, Maryt <Cooke.Maryt@epa.gov>; Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>; Walker, Stuart <Walker.Stuart@epa.gov>; Young, Dianna <Young.Dianna@epa.gov>  
**Cc:** Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Laija, Emerald <Laija.Emerald@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>  
**Subject:** Consultation on the Navy's use of the RESRAD BUILD calculator to evaluate Hunters Point remediation goals

Mary –

I'll forward the files I've sent to Stuart in a separate email. The files provide inputs and results from the Navy's Building PRG calculator runs. The Navy also submitted files related to their use of the RESRAD BUILD calculator. Stuart asked that I hold off on sending those.

My contractor is continuing to evaluate the Navy submittals and trying to identify the main reasons why the BPRG and RESRAD calculators generate different results. My next check in with our contractor is Monday. I can let you know after my call with the contractor when I think it would be helpful to further engage with FFRRO/OSRTI.

Wayne Praskins | Superfund Project Manager  
U.S. Environmental Protection Agency Region 9  
75 Hawthorne St. (SFD-7-3)  
San Francisco, CA 94105  
415-972-3181

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**From:** Cooke, Maryt <Cooke.Maryt@epa.gov>  
**Sent:** Tuesday, November 12, 2019 10:48 AM  
**To:** Praskins, Wayne <Praskins.Wayne@epa.gov>; Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>; Walker, Stuart <Walker.Stuart@epa.gov>; Young, Dianna <Young.Dianna@epa.gov>  
**Cc:** Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Laija, Emerald <Laija.Emerald@epa.gov>  
**Subject:** RE: Time Critical: Closing the loop on R9 draft soils letter HP

Hi Wayne - - could you please forward to me what you sent to Stuart last week?

Stuart – Have you had time to review the information?

I would like to get the consultation on the calendars so that the Region can move forward.

Thank you!

Mary

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**From:** Cooke, Maryt

**Sent:** Tuesday, November 5, 2019 12:24 PM

**To:** Praskins, Wayne <[Praskins.Wayne@epa.gov](mailto:Praskins.Wayne@epa.gov)>; Fitz-James, Schatzi <[Fitz-James.Schatzi@epa.gov](mailto:Fitz-James.Schatzi@epa.gov)>; Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>; Young, Dianna <[Young.Dianna@epa.gov](mailto:Young.Dianna@epa.gov)>

**Cc:** Sanchez, Yolanda <[Sanchez.Yolanda@epa.gov](mailto:Sanchez.Yolanda@epa.gov)>; Laija, Emerald <[Laija.Emerald@epa.gov](mailto:Laija.Emerald@epa.gov)>

**Subject:** RE: Time Critical: Closing the loop on R9 draft soils letter HP

Good Morning, Wayne –

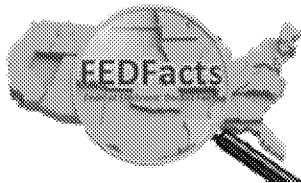
Can you please forward the BPRG vs RESRAD BUILD info that you received from the Navy to Stuart. We are going to try to schedule a call with Region 9, OSRTI and FFRRO to discuss this next week.

Thanks

Mary T. Cooke  
Environmental Protection Agency  
Office of Land and Emergency Management  
Federal Facilities Restoration and Reuse Office – 5106R  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N. W.  
Washington, DC 20460

Phone: 202-564-0788

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**From:** Praskins, Wayne <[Praskins.Wayne@epa.gov](mailto:Praskins.Wayne@epa.gov)>

**Sent:** Wednesday, October 30, 2019 12:16 PM

**To:** Fitz-James, Schatzi <[Fitz-James.Schatzi@epa.gov](mailto:Fitz-James.Schatzi@epa.gov)>; Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>; Cooke, Maryt <[Cooke.Maryt@epa.gov](mailto:Cooke.Maryt@epa.gov)>; Young, Dianna <[Young.Dianna@epa.gov](mailto:Young.Dianna@epa.gov)>; Herrera, Angeles <[Herrera.Angeles@epa.gov](mailto:Herrera.Angeles@epa.gov)>

**Cc:** Chesnutt, John <[Chesnutt.John@epa.gov](mailto:Chesnutt.John@epa.gov)>; Sanchez, Yolanda <[Sanchez.Yolanda@epa.gov](mailto:Sanchez.Yolanda@epa.gov)>; Gervais, Gregory <[Gervais.Gregory@epa.gov](mailto:Gervais.Gregory@epa.gov)>; Yap-deffler, Yazmine <[Yap-Deffler.Yazmine@epa.gov](mailto:Yap-Deffler.Yazmine@epa.gov)>; Laija, Emerald <[Laija.Emerald@epa.gov](mailto:Laija.Emerald@epa.gov)>

**Subject:** RE: Time Critical: Closing the loop on R9 draft soils letter HP

We are reviewing a package containing BPRG and RESRAD BUILD files that the Navy provided to the Region earlier this month. I'll talk with Mary about whether FFRRO/OSRTI would like us to send the Navy package now or wait for the Region to complete an initial review. The package includes a report and about 19 supporting files documenting the Navy's RESRAD BUILD and BPRG simulations.

Wayne Praskins | Superfund Project Manager  
U.S. Environmental Protection Agency Region 9  
75 Hawthorne St. (SFD-7-3)  
San Francisco, CA 94105

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**From:** Fitz-James, Schatzi <[Fitz-James.Schatzi@epa.gov](mailto:Fitz-James.Schatzi@epa.gov)>

**Sent:** Wednesday, October 30, 2019 9:08 AM

**To:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>; Cooke, Maryt <[Cooke.Maryt@epa.gov](mailto:Cooke.Maryt@epa.gov)>; Young, Dianna <[Young.Dianna@epa.gov](mailto:Young.Dianna@epa.gov)>; Herrera, Angeles <[Herrera.Angeles@epa.gov](mailto:Herrera.Angeles@epa.gov)>

**Cc:** Chesnutt, John <[Chesnutt.John@epa.gov](mailto:Chesnutt.John@epa.gov)>; Praskins, Wayne <[Praskins.Wayne@epa.gov](mailto:Praskins.Wayne@epa.gov)>; Sanchez, Yolanda <[Sanchez.Yolanda@epa.gov](mailto:Sanchez.Yolanda@epa.gov)>; Gervais, Gregory <[Gervais.Gregory@epa.gov](mailto:Gervais.Gregory@epa.gov)>; Yap-deffler, Yazmine <[Yap-Deffler.Yazmine@epa.gov](mailto:Yap-Deffler.Yazmine@epa.gov)>; Laija, Emerald <[Laija.Emerald@epa.gov](mailto:Laija.Emerald@epa.gov)>

**Subject:** RE: Time Critical: Closing the loop on R9 draft soils letter HP

Mary is talking to Wayne P, the RPM, this pm re: a consultation. Don't think the Navy has provided materials for a consultation thus far.

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**From:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>

**Sent:** Wednesday, October 30, 2019 11:27 AM

**To:** Fitz-James, Schatzi <[Fitz-James.Schatzi@epa.gov](mailto:Fitz-James.Schatzi@epa.gov)>; Cooke, Maryt <[Cooke.Maryt@epa.gov](mailto:Cooke.Maryt@epa.gov)>; Young, Dianna <[Young.Dianna@epa.gov](mailto:Young.Dianna@epa.gov)>; Herrera, Angeles <[Herrera.Angeles@epa.gov](mailto:Herrera.Angeles@epa.gov)>

**Cc:** Chesnutt, John <[Chesnutt.John@epa.gov](mailto:Chesnutt.John@epa.gov)>; Praskins, Wayne <[Praskins.Wayne@epa.gov](mailto:Praskins.Wayne@epa.gov)>; Sanchez, Yolanda <[Sanchez.Yolanda@epa.gov](mailto:Sanchez.Yolanda@epa.gov)>; Gervais, Gregory <[Gervais.Gregory@epa.gov](mailto:Gervais.Gregory@epa.gov)>; Yap-deffler, Yazmine <[Yap-Deffler.Yazmine@epa.gov](mailto:Yap-Deffler.Yazmine@epa.gov)>; Laija, Emerald <[Laija.Emerald@epa.gov](mailto:Laija.Emerald@epa.gov)>

**Subject:** RE: Time Critical: Closing the loop on R9 draft soils letter HP

Has anyone heard if the Navy is actually going to come in with a technical rationale for their RESRAD Build request to start an actual consultation?

Stuart Walker

Superfund Remedial program National Radiation Expert

Science Policy Branch

Assessment and Remediation Division

Office of Superfund Remediation and Technology Innovation

W (703) 603-8748

C (202) 262-9986

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**From:** Fitz-James, Schatzi <[Fitz-James.Schatzi@epa.gov](mailto:Fitz-James.Schatzi@epa.gov)>

**Sent:** Wednesday, October 30, 2019 11:24 AM

**To:** Cooke, Maryt <[Cooke.Maryt@epa.gov](mailto:Cooke.Maryt@epa.gov)>; Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>; Young, Dianna <[Young.Dianna@epa.gov](mailto:Young.Dianna@epa.gov)>; Herrera, Angeles <[Herrera.Angeles@epa.gov](mailto:Herrera.Angeles@epa.gov)>

**Cc:** Chesnutt, John <[Chesnutt.John@epa.gov](mailto:Chesnutt.John@epa.gov)>; Praskins, Wayne <[Praskins.Wayne@epa.gov](mailto:Praskins.Wayne@epa.gov)>; Sanchez, Yolanda <[Sanchez.Yolanda@epa.gov](mailto:Sanchez.Yolanda@epa.gov)>; Gervais, Gregory <[Gervais.Gregory@epa.gov](mailto:Gervais.Gregory@epa.gov)>; Yap-deffler, Yazmine <[Yap-Deffler.Yazmine@epa.gov](mailto:Yap-Deffler.Yazmine@epa.gov)>; Laija, Emerald <[Laija.Emerald@epa.gov](mailto:Laija.Emerald@epa.gov)>

**Subject:** RE: Time Critical: Closing the loop on R9 draft soils letter HP

I also forwarded to Dana, who will look (may have found?) Dianna re this matter.

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**From:** Cooke, Maryt <[Cooke.Maryt@epa.gov](mailto:Cooke.Maryt@epa.gov)>

**Sent:** Wednesday, October 30, 2019 11:22 AM

**To:** Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>; Young, Dianna <[Young.Dianna@epa.gov](mailto:Young.Dianna@epa.gov)>; Herrera, Angeles <[Herrera.Angeles@epa.gov](mailto:Herrera.Angeles@epa.gov)>

**Cc:** Chesnutt, John <[Chesnutt.John@epa.gov](mailto:Chesnutt.John@epa.gov)>; Praskins, Wayne <[Praskins.Wayne@epa.gov](mailto:Praskins.Wayne@epa.gov)>; Sanchez, Yolanda <[Sanchez.Yolanda@epa.gov](mailto:Sanchez.Yolanda@epa.gov)>; Gervais, Gregory <[Gervais.Gregory@epa.gov](mailto:Gervais.Gregory@epa.gov)>; Yap-deffler, Yazmine <[Yap-Deffler.Yazmine@epa.gov](mailto:Yap-Deffler.Yazmine@epa.gov)>

Deffler.Yazmine@epa.gov>; Laija, Emerald <Laija.Emerald@epa.gov>; Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>

**Subject:** RE: Time Critical: Closing the loop on R9 draft soils letter HP

Thanks, Stuart. This is helpful.

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**From:** Walker, Stuart <Walker.Stuart@epa.gov>

**Sent:** Wednesday, October 30, 2019 11:19 AM

**To:** Young, Dianna <Young.Dianna@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>

**Cc:** Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Gervais, Gregory <Gervais.Gregory@epa.gov>; Yap-deffler, Yazmine <Yap-Deffler.Yazmine@epa.gov>; Laija, Emerald <Laija.Emerald@epa.gov>; Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>; Cooke, Maryt <Cooke.Maryt@epa.gov>

**Subject:** RE: Time Critical: Closing the loop on R9 draft soils letter HP

NOTE: The Navy never sent the material (basically risk runs with RESRAD Build and the BPRG calculator with a technical justification for why they wanted to switch) to begin a risk assessment consultation under Q&A guidance. In earlier discussions the Navy did not have a scientific rationale for wanting to switch, it was more economic. See some screenshots on the consultation process at this URL

<https://semspub.epa.gov/work/HQ/176329.pdf>

see page 17

**To avoid unnecessary inconsistency between radiological and chemical risk assessment at the same site, users should generally use the same model for chemical and radionuclide risk assessment.** If there is a reason on a site-specific basis for using another model justification for doing so should be developed. The justification should include specific supporting data and information in the administrative record. The justification normally would include the model runs using both the recommended EPA PRG model and the alternative model. Users are cautioned that they should have a thorough understanding of both the PRG recommended model and any alternative model when evaluating whether a different approach is appropriate. When alternative models are used, the user should adjust the default input parameters to be as close as possible to the PRG inputs, which may be difficult since models tend to use different definitions for parameters. Numerous computerized mathematical models have been developed by EPA and other organizations to predict the fate and transport of radionuclides in the environment; these models include single-media unsaturated zone models (for example, groundwater transport) as well as multi-media models. These models have been designed for a variety of goals, objectives, and applications; as such, no single model may be appropriate for all site-specific conditions. Generally, even when a different model is used to predict fate and transport of radionuclides through different media, EPA recommends using the PRG calculators for the remedial program to establish the risk-based concentrations to ensure consistency with CERCLA, the NCP and EPA's Superfund guidance for remedial sites.

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**Q10. For CERCLA risk assessments at remedial sites, is it appropriate to use guidance or approaches developed by other Federal, State or Tribal Agencies or by International or National Organizations?**

A. EPA has made the policy decision that risks from radionuclide exposures at remedial sites should be estimated in the same manner as chemical contaminants, which is consistent with EPA's remedial program implementing guidance (e.g., EPA 1997g, 1999d, 2000f). Consequently, approaches that do not follow the remedial program's policies and guidance should not be used at CERCLA remedial sites. Should regional staff have questions, they should consult with the Superfund remedial program's National Radiation Expert (Stuart Walker of OSRTI at the time this fact sheet was issued, at (703) 603-8748 or [walker.stuart@epa.gov](mailto:walker.stuart@epa.gov)), before using guidance from other organizations that is not already incorporated into this and other EPA Superfund remedial program guidance. The current Superfund remedial program's National Radiation Expert will be listed on the Superfund Radiation webpage at: <http://www.epa.gov/superfund/health/contaminants/radiation/index.htm>.

Stuart Walker  
Superfund Remedial program National Radiation Expert  
Science Policy Branch  
Assessment and Remediation Division  
Office of Superfund Remediation and Technology Innovation  
W (703) 603-8748  
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**From:** Young, Dianna <[Young.Dianna@epa.gov](mailto:Young.Dianna@epa.gov)>  
**Sent:** Wednesday, October 30, 2019 10:43 AM  
**To:** Herrera, Angeles <[Herrera.Angeles@epa.gov](mailto:Herrera.Angeles@epa.gov)>  
**Cc:** Chesnutt, John <[Chesnutt.John@epa.gov](mailto:Chesnutt.John@epa.gov)>; Praskins, Wayne <[Praskins.Wayne@epa.gov](mailto:Praskins.Wayne@epa.gov)>; Sanchez, Yolanda <[Sanchez.Yolanda@epa.gov](mailto:Sanchez.Yolanda@epa.gov)>; Gervais, Gregory <[Gervais.Gregory@epa.gov](mailto:Gervais.Gregory@epa.gov)>; Yap-deffler, Yazmine <[Yap-Deffler.Yazmine@epa.gov](mailto:Yap-Deffler.Yazmine@epa.gov)>; Laija, Emerald <[Laija.Emerald@epa.gov](mailto:Laija.Emerald@epa.gov)>; Walker, Stuart <[Walker.Stuart@epa.gov](mailto:Walker.Stuart@epa.gov)>; Fitz-James, Schatzi <[Fitz-James.Schatzi@epa.gov](mailto:Fitz-James.Schatzi@epa.gov)>; Cooke, Maryt <[Cooke.Maryt@epa.gov](mailto:Cooke.Maryt@epa.gov)>  
**Subject:** Re: Time Critical: Closing the loop on R9 draft soils letter HP

Angeles

To the best of my knowledge, we did not get feedback from Dana regarding the Region's draft response to the Navy soils addendum. It is my understanding that Stuart had no further comments. OSRTI, please confirm or correct that.

I apologize for the delay in getting back to you regarding the consultation. Wayne should expect to hear from Mary Cooke today about that.

I am attending the ASTSWMO annual meeting today and tomorrow morning but am attending to email. Please let me know if you have questions or concerns.

Dianna

On Oct 28, 2019, at 7:01 PM, Herrera, Angeles <[Herrera.Angeles@epa.gov](mailto:Herrera.Angeles@epa.gov)> wrote:

Did you hear anything from Dana Stalcup? We just want to make sure both Greg and Dana are on board position outlined in our letter.

Also, on Oct 9, we sent Greg the formal request for consultation on the building remediation goals including the Navy's request to use RESRAD tool. Any update on that?

Thanks!  
Angeles

Sent from my iPhone

On Oct 18, 2019, at 12:24 PM, Young, Dianna <[Young.Dianna@epa.gov](mailto:Young.Dianna@epa.gov)> wrote:

Angeles,

FFRRO and OSRTI have coordinated on the review of Region 9 comments regarding the Navy's draft soils letter. We suggest one clarification, as follows:

For this review, EPA focused its review to the PRG calculations. This is EPA's preferred approach for developing preliminary remediation goals and assessing remediation goals for contaminated soil, air, and water at Superfund cleanups.

Apologies for the delay. Let me know if you have any questions or comments.

Thanks,  
Dianna